

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:21-MJ-08235-SRW
)	
JASON WOOLBRIGHT,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION

The United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jason Dunkel, Assistant United States Attorney for said District, moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq. As and for its grounds, the United States of America states as follows:

5. Defendant already has a pending Order of Detention that committed him to the custody of the United States Marshals Service. He was in that custody when he committed the escape for which he is now charged.

6. As set out in the Complaint Affidavit, Defendant escaped custody. Defendant's escape from custody establishes by a preponderance of the evidence that he is a flight risk and is unlikely to appear in Court as ordered or is unlikely to surrender as ordered if conviction. Defendant's escape is also evidence that he refuses to abide by the orders of this Court and will not abide by conditions of release.

WHEREFORE, as there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community, the Government requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Jason S. Dunkel

JASON DUNKEL, #65886(MO)
Assistant United States Attorney
111 South Tenth Street, 20th Floor
Saint Louis, Missouri 63102
Jason.Dunkel@usdoj.gov
Telephone: (314) 539-2200
Facsimile: (314) 539-3887